

EXHIBIT 7

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN CIVIL LIBERTIES UNION,)
et al.,)

Plaintiffs,)

v.)

ALBERTO R. GONZALES, in his official)
capacity as Attorney General of the United)
States,)

Defendant.)

Civil Action No.
98-CV-5591

**HEATHER CORINNE REARICK'S RESPONSES AND OBJECTIONS TO
DEFENDANT'S FIRST SET OF INTERROGATORIES**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Heather Corinna Rearick ("Plaintiff") responds and objects to Defendant Alberto R. Gonzales's First Set of Interrogatories ("Interrogatories") as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to the Interrogatories to the extent the instructions and demands therein purport to impose obligations in addition to, beyond, or different from those set forth in the Federal Rules of Civil Procedure and the Rules of Civil Procedure of the United States District Court for the Eastern District of Pennsylvania.
2. Plaintiff objects to the Interrogatories to the extent they call for the identification or disclosure of information that is neither relevant to the claims and defenses of any party in this action nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff submits these responses and objections without conceding the relevance or materiality of the subject matter of any interrogatory.

INTERROGATORY NO. 12

Identify the number or proportion of ACLU members who have provided a credit card number to a website in order to purchase membership, online content, and/or other items for sale, to make a donation, or to make a reservation (such as a rental car or hotel reservation).

RESPONSE TO INTERROGATORY NO. 12

Plaintiff objects to this Interrogatory because it calls for identification of information not within the possession, custody or control of the Plaintiff. Subject to the foregoing and to the General Objections, Plaintiff states that it has no information responsive to this request.

INTERROGATORY NO. 13

For each website plaintiff, identify a representative sample of webpages on your website which contains material about which you fear prosecution under COPA, as referenced in Paragraph 2 in the section titled "The Impact of COPA on Plaintiffs" on page 24 of the Amended Complaint that "[P]laintiffs fear prosecution under COPA for communicating, sending, displaying, or distributing material that might be deemed 'harmful to minors' by some community in the United States."

RESPONSE TO INTERROGATORY NO. 13

Plaintiff objects that this Interrogatory is premature, unreasonably cumulative and duplicative of Document Requests No. 1 and No. 13, and calls for identification of information that is in the public domain. Plaintiff also objects that the phrases used to define "representative sample," including "distribution of characteristics," "degree of explicitness of sexual content," and "population or universe" are vague and ambiguous. Subject to the foregoing and to the General Objections, Plaintiff refers to the web content identified in the Amended Complaint and responds as follows:

1) www.femmerotic.com contains numerous nude photographs of Plaintiff and others in the "Gallery" section of the website. www.femmerotic.com contains candid and explicit discussions of sexuality in the "Journal" section of the website. www.femmerotic.com contains frank discussions of sexuality in the "FAQ" section of the website;

2) www.scarleteen.com contains links to essays explicitly and candidly dealing with issues pertaining to, among other topics, sex, masturbation, pornography, homosexuality, and human sexual anatomy on the website's front page;

3) www.scarleteen.com contains essays explicitly and candidly covering issues pertaining to, among other topics, sex, masturbation, homosexuality, and human sexual anatomy, in the front pages, and "Articles" and "Advice" subsections of the following sections of the website:

- a) "Body" <http://www.scarleteen.com/body/index.html> (last viewed October 23, 2005);
- b) "SexYOUality" <http://www.scarleteen.com/sexuality/index.html> (last viewed October 23, 2005);
- c) "Reproduction" <http://www.scarleteen.com/reproduction/index.html> (last viewed October 23, 2005);
- d) "Infection Section" <http://www.scarleteen.com/infection/index.html> (last viewed October 23, 2005);
- e) "Pink Slip" <http://www.scarleteen.com/pink/index.html> (last viewed October 23, 2005);
- f) "Boyfriend" <http://www.scarleteen.com/boyfriend/index.html> (last viewed October 23, 2005);

g) "Take Two" <http://www.scarleteen.com/relationships/index.html> (last viewed October 23, 2005);

h) "Gaydar" <http://www.scarleteen.com/gaydar/advice.html> (last viewed October 23, 2005);

i) "Sexual Politics" <http://www.scarleteen.com/politics/index.html>. (last viewed October 23, 2005);

4) www.scarleteen.com contains candid and explicit discussions of issues pertaining to, among other topics, sex, masturbation, pornography, homosexuality and human sexual anatomy in the "Talk" section of the website, <http://www.scarleteen.com/cgi-bin/forum/Ultimate.cgi> (last viewed October 23, 2005);

5) The front page of www.scarletletters.com contains previews of and links to content on other pages within the site that contain candid and explicit discussions, images, poetry and prose of a sexual nature. <http://scarletletters.com/current/index.html> (last viewed October 23, 2005);

6) The visual art and photography sections of www.scarletletters.com contain photos and links to photos depicting, among other things, nude men and women and various sexual acts <http://scarletletters.com/current/art.html> (last viewed October 23, 2005);

7) The prose and poetry section of the website, <http://scarletletters.com/current/prose.html>, (last viewed October 23, 2005), contains stories and links to stories that contain explicit and candid sexual content regarding, among other things, sex, masturbation, sexual identity, and various forms of sexual acts;

8) The nonfiction section of <http://www.scarletletters.com>, <http://scarletletters.com/current/nonfiction.html> (last viewed October 23, 2005) contains essays

and commentary and containing candid and explicit accounts of, among other things, sex, masturbation, sexual identity, sexual acts and human sexual anatomy;

9) The discussion of www.scarletletters.com, <http://scarletletters.com/current/forums.shtml> (last viewed October 23, 2005) and the links accessible therein contain or may contain in the future message boards with candid and explicit discussions of, among other things, sex, masturbation, sexual identity, sexual acts and human sexual anatomy and other topics posted directly by internet web users.

INTERROGATORY NO. 14

For each website plaintiff, identify a representative sample of webpages on your website which you believe contains material that has serious literary, artistic, political, scientific and/or social value for adults.

RESPONSE TO INTERROGATORY NO. 14

Plaintiff objects to the extent this Interrogatory calls for the identification of information that is neither relevant to the claims and defenses of any party in this action nor reasonably calculated to lead to the discovery of admissible evidence. COPA does not take into account the subjective beliefs of speakers with regard to the content they provide on the Internet. Additionally, under COPA, it is irrelevant whether material has "social value for adults." Plaintiff further objects that the phrases used to define "representative sample," including "distribution of characteristics," "degree of explicitness of sexual content," and "population or universe" are vague and ambiguous. Plaintiff also objects that this Interrogatory is premature and calls for identification of information that is in the public domain. To the extent this Interrogatory purports to inquire whether Plaintiff believes that any of the webpages on its

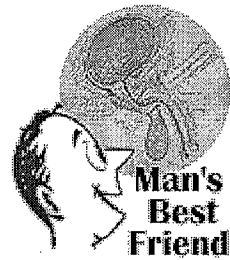
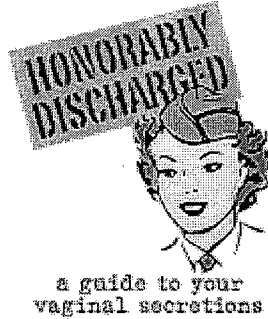
your anatomy, positive self-image, health and every body's business

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crisis hotline
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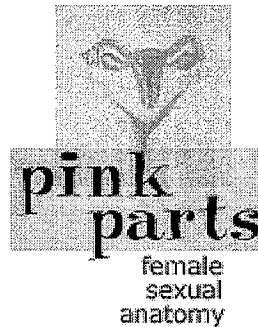
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male sexual
anatomy

Sexual Health 101: His & Hers

Basic regimens for the care each of you need to keep yourself well. Self-exams, nutritional helpers, safer sex and more.



More at Skin Deep

On the Rag

It doesn't have to be a drag: find out how your menstrual cycles works and how to work it.

Recent Advice

How can I be sure that when I have sexual intercourse, my boyfriend won't penetrate my urinary opening?

What do you love about your body? Our members sound off about their best-loved parts to chase the negative body image blues away.

Want more articles, advice of links?

Click on the indexes up top and find even more of what you're looking for.

At Reproduction: Where DID I Come From?

Haven't found out anything new about how conception happens since grade school? Dig your way out of the cabbage patch for a refresher course.

the information and education you need to help find the you in sexuality

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Safe,
Sound
& Sexy

how to bring safer sex into the
bedroom without the buzzkill

Safe, Sound...and Sexy

A Safer Sex Primer That Gets Real

Want to know what to use, when to use it, and how to get safer sex into your bedroom without getting surly? Founder Heather Corinna dishes it out and serves it up.



a memoir of first-time-sex
17 years in the making

Is THAT All There Is?

Editor Heather Corinna recalls her experience with first-time intercourse without the melodrama and doles out a few pieces of practical advice.

Ready or Not?

Think you're ready for sexual intercourse? Do y

favor and look through our checklist and be sure -- it's
more complicated and demanding than most people think.

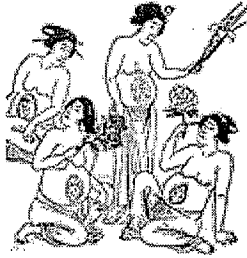
your reproductive choices, your sexual realities and how it all works

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Where DID I Come From?

a refresher course
in human reproduction

Where DID I Come From?

An advanced lesson in reproduction

Beyond the cabbage patch, there's a place where human reproduction is actually explained...here! If you haven't ever read up on the real nitty-gritty (or it's been a while), now's your chance.

More Reproduction

What's The Risk?

Use our handy flow charts to determine the pregnancy risk inherent in any number of different sexual activities.

Recent Advice
My girlfriend's periods are irregular. What are her chances of pregnancy?

What's The Risk?

Five Easy Risk Assessment Flow Charts
Use our handy flow charts to determine the pregnancy risk inherent in any number of different sexual activities, for when you're panicking, or better yet, for figuring out what you're really ready to handle.

Are you a teen or young mother? Then check out our message board forum for young parents, where you can get some support and a place to chat it up.

Want more articles, advice of links?

Click on the indexes up top and find even more of what you're looking for.

What's The Risk?



easy pregnancy
risk assessment

The Infection Section

Remember that being sexually active means being responsible for more than just pregnancy and birth control -- preventing the spread of disease and infection is part of your responsibility too: for yourself and the world you live in.

sexually transmitted disease and infection and safer sex information

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common sexually
transmitted diseases
and infections

HPV & HERPES

Why Safer Sex Just
Isn't Always Enough

The STI Files

Sexually transmitted
diseases and infections
Our new series
takes a close look
at the most
common sexually
transmitted
diseases and
infections.

Recently added:

Gonorrhea, Hepatitis
B, Mononucleosis,
Pubic Lice, Scabies,
Syphilis and
Trichomoniasis.

HPV & Herpes

Safer sex always
offers us far more
protection than
going without, but
with some
infections, it may
only get us so far.
Read up so your
choices can be
informed ones.

More Infection Section

The quickie that
could save your
life.

Check out our
simple quickie
STD/STI risk
assessment so
that you know
what you're really
getting into.

Recent Advice
How do I know if I
have a yeast
infection or not?

I'm worried about
my friend who just
won't play it safe.
One user
wonders what she
can do for her
friend when all
the information in
the world doesn't
help.

Want more articles, advice of links?

Click on the
indexes up top
and find even
more of what
you're looking for.

At Sexuality: Safe, Sound...and Sexy

Want to know what to use, when to use it, and how to get
safer sex into your bedroom without getting surly?

the real deal on all your girly goods and your female sexual issues

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SEVEN WAYS TO LOVE YOUR BODY



On The Rag

Seven Ways to Love Your Body

Ophira Edut, of *Adios Barbie* and *HUES*, shares some smart, from-the-heart tips on learning to get over yourself and love your body for what it really is.

On The Rag

Everything you need to know about your fertility cycles and menstruation...period. From why you have it to how it works, to what to catch your flow with, we've got it all.

More Pink Slip

Is Masturbation Okay?
It sure is -- yes, even if you're a girl. Read up and find out why.

Recent Advice
What is douching, or douchebags, and should women douche?

Want more articles, advice of links?
Click on the indexes up top and find even more of what you're looking for.

At Take Two: Sexual Negotiation for the Long Haul

Practical advice on how to keep your sex life fair as well as fantastic in a long-term relationship.

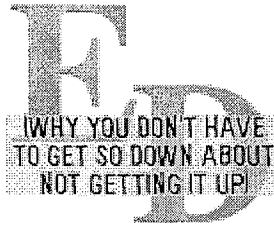
sex sense and information that's made just for you, boyfriend!

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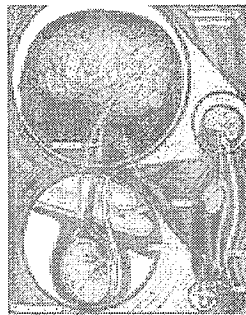
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WHY YOU DON'T HAVE
TO GET SO DOWN ABOUT
NOT GETTING IT UP!



DO YOU KNOW
DICK?

Why You Don't Have to Get So Down About Not Getting It Up

If you think that even a little difficulty in this department means that you should start stocking up on Viagra, take a reality check and find out the real deal with erectile dysfunction.

Do You Know Dick?

...well, do ya? Sexuality author Hanne Blank provides a short, handy quiz for you to find out what you really know -- and don't -- about your penis.

More at Boyfriend

FBI Files: Blue Balls

What is it really, and how serious can it really be? Is it true that women can get it, too?

Recent Advice
What exactly is circumcision, and how is it done?

The Mens Room
Have a look at our section of the boards that's just for you guys.

Want more articles, advice or links?

Click on the indexes up top and find even more of what you're looking for.

At Reproduction: Where DID I Come from?

Haven't found out anything new about how conception happens since grade school? Dig your way out of the cabbage patch for a refresher course.

■ dating, relating and integrating with friends, family and partners ■

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Safer Sex...for your heart

Protecting yourself above as well as below the waist

We hear a lot of talk about safer sex when it comes to protecting our bodies. But what about how to protect our emotions, too?

Potholes & Dead Ends

When you're driving, you've got to keep your eyes on the road. Same goes for relationships: learn to be on the lookout for some common problems in early relationships and practice some interpersonal accident prevention.

**POTHoles &
DEAD ENDS**
*relationship
ROAD BLOCKS
to look out for*

More Relationships

Working The Kinks Out

Check out our answer to one frazzled girlfriends query about her BDSM-curious boyfriend (at SexYOUality).

Recent Advice

I lied to my boyfriend about being a virgin -- so now what do I do?

The Relationships Forum

Need to dish, vent or wax poetic about boyfriends, girlfriends, friends or family?

Want more articles, advice of links?

Click on the indexes up top and find even more of what you're looking for.

At Gaydar: Homosexuality and Bisexuality Basics

Staright people aren't the only ones in relationships, you know. Read up on the basics of homosexuality and bisexuality and watch as we magically dispel some very silly myths.

the scarleteen satellite for gay, lesbian, bisexual and transgendered issues

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Don't Let The Door Hit You On The Way

out

Or, How to Come
Out of the Closet
Without Tripping
on the laundry

THE MAKING OF A HOMO



(by James
Elliott)

Don't Let the Door Hit You on the Way Out

(Or, How to Come Out
of the Closet Without
Tripping Over the
Laundry)

Need a few tips
on how to come
out with grace
and a minimal
number of
whoopsies?

The Making of a Homo

James Elliott
shares some of
his pivotal
teenage
experiences with
homosexuality
and living life out
of the closet at
15.

More Gaydar

Recent Advice
How do I approach
my new female
crush without
scaring her to
death?

Is 14 "too young" to
understand your
sexual orientation?
Find out why age
really has nothing
to do with it.

At the Boards:

How to come out to
your parents with
minimal bloodshed.

Want more articles, advice of links?

Click on the
indexes up top and
find even more of
what you're looking
for.

At Skin Deep: The Male and Female Sexual Anatomy

If you're thinking about being sexually active with anyone, a good place to start is to get to know how both of your bodies work.

because the bedroom isn't the only place you should be sexually active

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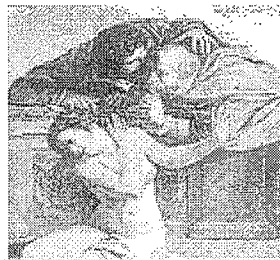
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NO BIG DEAL

(SEX & DISABILITY)

To Jane and Sarah
FOR THEIR 30TH
BIRTHDAY



Magical Cups Bloody Brides

virginity in context

Taking the "dis" out of disabled

There is really only one thing that you need to know about sex and disability:

Disabled people have sex, too.

To Jane and Sarah: for Their 30th Birthday

A reprinted letter from the editor commemorating the anniversary of Roe Vs. Wade, and addressing the right to choice from an intimate viewpoint.

Magical Cups and Bloody Brides

Are you really a "virgin"? Are you sure you know what that means? Slide though history with us and find out what virginity means and what it might mean to you.

More Sexual Politics

Boys Will Be Boys... or Not?
Do you think there are only two genders? Think again.

Recent Advice
I'm 14, and I want to have a baby, no matter what anyone else says.

Get all riled up...
...and sound off in the Sexual Ethics and politics forum at the Scarleteen message boards.

Want more articles, advice of links?
Click on the indexes up top and find even more of what you're looking for.

Why Scarleteen?

In the wake of new studies stating the things we've been trying for years to get people to notice, we revisit why we do the things we do and restate our commitment to doing them.



scarleteen.com

got questions? get answers.

The Scarleteen Boards

[login](#) | [register](#) | [search](#) | [faq](#) | [forum home](#)


» Today's Active Topics «







» You are not logged in. [Login](#) or [register](#)

Registered Members: 29895



Welcome to our newest member: sarahh47

Forum	Topics	Posts	Last Post
Expert Advice			
Ask Scarleteen Need expert advice or information? STAFF AND VOLUNTEER REPLIES ONLY.	13501	30604	another question (sarahh47) 07-22-2006 10:01 AM
Emergencies and Crises Immediate emergencies and crises. STAFF AND VOLUNTEER REPLIES ONLY.	2617	8887	Re: i masturbate alot (wobblyheadedjane) 07-22-2006 07:52 AM
Scarleteen Central			
Sex Basics and Sexual Health Sexuality and sexual health 101.	7515	33755	Re: Condom Brands (Mitsuki) 07-22-2006 08:31 AM
Body and Soul Body and self issues, concerns, and questions.	3014	18211	Re: aching hands (smileyjoseph) 07-22-2006 07:50 AM
General Health & Nutrition General body care and feeding.	1126	6561	Re: All vegan and vegetarian... (smileyjoseph) 07-22-2006 07:39 AM
Relationships Friends, family, partners and crushes.	5297	27440	Re: Friends -> Love (smileyjoseph) 07-22-2006 07:47 AM
Support Groups Need others who've been where you're at to help out?	875	6528	Re: my boyfriend has gay... (smileyjoseph) 07-22-2006 08:08 AM
Sexual Ethics and Politics Politics and ethics in sexuality and your lives.	710	9118	Re: What's Your Pleasure..... (smileyjoseph) 07-22-2006 08:22 AM





	Gender Issues Issues of gender identity, defintions and roles.	177	2221		Re: Chivalry: Opening doors... (smileyjoseph) 07-21-2006 03:04 PM
	Pregnancy and Parenting Real support for pregnancies and young parents.	1108	6137		Re: Baby Names (daria319) 07-22-2006 04:27 AM
	Scarleteen Polls & Surveys Represent yourself!	13	68		sexual honesty (Miz Scarlet) 05-22-2006 07:57 AM
Gaydar					
	Orientation and Identity Step in and sort out your feelings about sexual identity.	683	4135		Re: Am I bisexual? (ookuotoe) 07-21-2006 09:40 PM
	GLBT Relationships Queer partners, friends, community or family.	529	2904		Re: member of the club (catalinacisne) 07-18-2006 11:51 PM
Shop Talk					
	Sexual Literacy: Books and Magazines Books, magazines and other media.	112	627		Re: desperately needing help (LilBlueSmurf) 05-17-2006 07:11 AM
	Safer Sex & Birth Control Condoms, lubes and safer sex tools.	1006	4021		Re: Birth Control in Texas. (dailicious) 07-22-2006 12:56 AM
	Sexual Health and Medicine Sexual health products and comments.	115	820		Re: hickies (dolphins18) 06-29-2006 06:21 PM
Town Hall					
	Article Questions & Chat Ask questions or discuss Scarletteen articles here.	78	942		Re: Pink Slip: Is Masturbation... (smileyjoseph) 07-08-2006 02:08 PM
	It's All About You! ...and the world that revolves around you.	928	12320		Weak nerves? No to look. (olegww) 07-22-2006 05:20 AM
	Village People Personal threads for our gregarious netizens.	288	4218		Re: ThisGuy (Beppie) 07-22-2006 03:58 AM
	Parents, Adults and Teens Issues and concerns which affect all of us.	181	1540		Re: Trying to make a life... (Miz Scarlet) 07-21-2006 12:42 PM

-  **Site Help and Service** **172** **663**  **Re: moderator notice (DarkChild717)**
Need a hand finding what you need? **07-11-2006** 10:26 AM
-  **Staff Stuff** **167** **660**  **Questions for Miz Scarlet (Monotonous)**
The place to leave notes, comments or questions for Heather Corinna or other Scarletteen staff. **07-21-2006** 07:24 PM
-  **Advocate Area** **880** **9099**  **07-22-2006** 09:31 AM
Staff discussion and management. Password restricted.

Read-Only Archive

-  **Ask a Sexpert** **3222** **6436**  **Re: infection (bettie)**
The read-only archive of Ask a Sexpert. **08-28-2002** 11:51 AM

Our Archives

-  **Ask a Sexpert Archive** **400** **1206**  **Archive: Read-Only Forum**
Sexpert advice of yesteryear.
-  **Frequently Asked Questions** **73** **447**  **Archive: Read-Only Forum**
Links to our most frequently asked questions in each forum.

The Scarletteen Boards Recent Visitors: 170

Faith54, smileyjoseph, harvestgirl, Whiskeyginger, scaredsilly10, ScarcelyHeard, sarahh47, Mitsuki, Mr. Matthew, Rob91, cheer, faifai, karybu, wobblyheadedjane, summergoddess, JamsessionVT, Miz Scarlet, elektrikluv, WolfTiger, Francine, and 150 guest(s)

Icon Legend

-  New Posts Since Your Last Visit  No New Posts Since Your Last Visit

Contact Us | Scarletteen: Sex Ed for the Real World

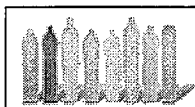
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Google™

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Google Search



Simply the finest condoms
and coolest stuff.
Condomania.

